

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

JUDITH CURRAN and MICHAEL EARP, for the
use and benefit of the Principal Funds, Inc.
Strategic Asset Management (SAM) Balanced
Portfolio, Principal SAM Strategic Growth
Portfolio, *et al.*,

Plaintiffs,

v.

PRINCIPAL MANAGEMENT CORPORATION,
PRINCIPAL GLOBAL INVESTORS, LLC, and
PRINCIPAL FUNDS DISTRIBUTOR, INC.

Defendants.

Case No. 4:09-cv-00433-RP-CFB

**JOINT MOTION TO AMEND
EXPERT DISCLOSURE SCHEDULE**

Defendants Principal Management Corporation and Principal Funds Distributor, Inc. (“Defendants”), on the one hand, and Plaintiffs Judith Curran and Michael Earp (“Plaintiffs”), on the other hand, jointly move to amend the current scheduling order (Dkt. 92), as set forth below. The parties seek to amend the deadlines relating to responsive and rebuttal expert witness disclosures because they anticipate that their respective experts will require some additional time to complete their expert reports. This proposed amendment to the schedule will *not* impact either the dispositive motion deadline or the trial date. In further support of this joint motion, the parties state as follows:

1. On August 15, 2011, the Court entered an Order Adopting Scheduling Order and Discovery Plan, Setting Trial and Final Pretrial, which, *inter alia*, set deadlines of September 14, 2012 for Defendants’ expert witness disclosures and October 12, 2012 for Plaintiff’s rebuttal witness disclosures.

2. The parties have met to discuss the expert witness disclosures, and they have concluded that their respective experts are likely to need a brief additional period in which to complete their responsive and rebuttal reports.

3. Accordingly, the parties respectfully request that the Court permit an amendment to those expert disclosure deadlines that will extend the deadlines for responsive and rebuttal reports by approximately 30 days. Specifically, the parties propose the following amended deadlines for those expert disclosures:

Defendants' Expert Witness disclosures due by October 12, 2012

Plaintiff's Rebuttal Witness disclosures due by November 21, 2012.¹

4. Granting this motion and extending the deadlines as requested will not impact the forthcoming dispositive motion and trial dates, set for February 15, 2013 and June 17, 2013, respectively.

5. The parties herewith submit a proposed amended scheduling order for the Court's consideration.

WHEREFORE, the parties respectfully request that the Court amend the current scheduling order in the manner described above.

¹ Plaintiffs' counsel and experts are currently scheduled to start a trial on October 22, 2012. If trial commences on this date, it is possible that Plaintiffs will need an additional, brief extension of time to complete their rebuttal reports. Should the trial commence, the parties will work with each other on a reasonable extension that will not otherwise affect the dispositive motion and trial dates for this case but wanted to make the Court aware of this potential issue.

Dated: July 13, 2012

Respectfully submitted,

/s/ Tana Lin (with permission)

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on July 13, 2012, I cause the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties so registered.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 13th day of July, 2012.

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